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Attorneys for Defendants

RIMINI STREET, INC. and SETH RAVIN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;
ORACLE AMERICA, INC., a Delaware
corporation; and ORACLE INTERNATIONAL
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC. , a Nevada corporation;
SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DEFENDANTS' ADMINISTRATIVE
MOTION TO PERMIT DEFENDANTS
TO FILE UNDER SEAL
DEFENDANTS' EMERGENCY
MOTION FOR PROTECTIVE ORDER
REGARDING CUSTOMER
DEPOSITIONS AND EXHIBIT A TO
THE DECLARATION OF ERIC
BURES**

I. INTRODUCTION

Defendants Rimini Street, Inc., and Seth Ravin (collectively, “Defendants”) respectfully request that the Court order the Clerk of the Court to file the following documents under seal:

1. The unredacted version of Defendants’ Emergency Motion for Protective Order Regarding Customer Depositions;
2. The unredacted version of Exhibit A to the Declaration of Eric Buresh in Support of Defendants’ Emergency Motion for Protective Order Regarding Customer Depositions;

Placeholders for these documents were lodged with the Court on November 7, 2011. This request is made pursuant to Federal Rules of Civil Procedure 5.2 and 26(c) and the Stipulated Protective Order entered by the Court on May 21, 2010 [Docket No. 55] (“Protective Order”).

II. ARGUMENT

Parties requesting to file documents under seal may overcome the presumption of public access by showing of good cause under Rule 26(c). “The law . . . gives district courts broad latitude to grant protective orders to prevent disclosure of materials for many types of information, including, but not limited to, trade secrets or other confidential research, development, or commercial information. *See* Fed. R. Civ. P. 26(c)(7).” *Phillips ex rel. Estates of Byrd v. Gen. Motors Corp.*, 307 F.3d 1206, 1211 (9th Cir. 2002).

Good cause exists for filing the above listed documents under seal. They have been designated as Confidential or Highly Confidential or they contain content that has been designated as Confidential or Highly Confidential under the terms of the Protective Order. By openly filing the remaining exhibits and documents that do not require confidentiality without seal, Defendants’ request is narrowly tailored. Because the above listed documents contain information designated as either “Confidential” or “Highly Confidential—Attorney Eyes Only,” good cause exists to permit a sealing order. *See, e.g., Pacific Gas and Elec. Co. v. Lynch*, 216 F. Supp. 2d 1016, 1027 (N.D. Cal. 2002).

For the foregoing reasons, Defendants respectfully request that the Court find that good cause exists to file under seal Defendants' Emergency Motion for Protective Order Regarding Customer Depositions and Exhibit A to the Declaration of Eric Buresh in Support of Defendants' Emergency Motion for Protective Order Regarding Customer Depositions. A Proposed Order is submitted with this Motion.

By: /s/ Eric Buresh
Eric Buresh, Esq.
Attorney for Defendants
Rimini Street, Inc. and Seth Ravin